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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

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CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS

BY CLERK RKV

UNITED STATES OF AMERICA,

Plaintiff,

v.

JIMMY TORRES aka
JIMMY TORRES-HOYOS, (1),
EDUARDO RODRIGUEZ, (2),

EDDIE RAMOS, (4),

RAMON ERNESTO ARMIJO, (11),
MATHEW ARTEAGA, (12),
DESTINY DELAFUENTE, (13),

ROBERT ALCARAZ, (15),
LISA CAMPOS, (16),

Defendants.

§ CRIMINAL NO. SA-12-CR-5700

§ FIRST SUPERSEDING INDICTMENT

§ [Violations: 18 U.S.C. § 922(g)(9),
§ Possession of a Firearm by a Prohibited
§ Person – Count 1;
§ 18 U.S.C. § 922(g)(5)(A), Possession of
§ a Firearm by an Illegal Alien – Count 2;
§ 18 U.S.C. §§ 924(a)(1)(A) & 2, False
§ Statement During the Purchase of a
§ Firearm & Aiding and Abetting -
§ Counts 3 – 33.]

THE GRAND JURY CHARGES:

COUNT ONE
[18 U.S.C. § 922(g)(9)]

That on or about the 21st day of December, 2011, within the Western District of Texas,
the Defendant,

JIMMY TORRES aka JIMMY TORRES-HOYOS, (1),
who had been convicted of a misdemeanor crime of domestic violence, to wit: on November 25, 2008, the Defendant was convicted of Assault Bodily Injury – Married, Cause Number 266647, County Court at Law No. 7, Bexar County, Texas, did knowingly possess in and affecting interstate commerce a firearm, namely, a Romarm/Cugir, WASR 10, 7.62 x 39 Rifle, bearing serial number 1-93502-11, said firearm having been shipped and transported in interstate commerce, in violation of Title 18, United States Code, Section 922(g)(9).

COUNT TWO
[18 U.S.C. § 922(g)(5)(A)]

That on or about the 21st day of December, 2011, within the Western District of Texas, the Defendant,

JIMMY TORRES aka JIMMY TORRES-HOYOS, (1),
then being an alien illegally and unlawfully in the United States, did knowingly possess in and affecting interstate commerce a firearm, namely, a Romarm/Cugir, WASR 10, 7.62 x 39 Rifle, bearing serial number 1-93502-11, said firearm having been shipped and transported in interstate commerce, in violation of Title 18, United States Code, Section 922(g)(5).

COUNT THREE
[18 U.S.C. § 924(a)(1)(A) and 2]

That on or about the 21st day of December, 2011, within the Western District of Texas, the Defendants,

JIMMY TORRES aka JIMMY TORRES-HOYOS, (1),

AND

EDUARDO RODRIGUEZ, (2),

each aiding and abetting the other, knowingly made a false statement and representation to J. O., a person licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Action Pawn #11, in that Defendant **EDUARDO RODRIGUEZ** did execute a United States Department of Justice, Bureau of Alcohol, Tobacco and Firearms Form 4473, Firearms Transaction Record, to the effect that he was the actual purchaser of a firearm, whereas in truth and in fact, he was not, in violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

COUNT FOUR
[18 U.S.C. § 924(a)(1)(A) and 2]

That on or about the 30th day of December, 2011, within the Western District of Texas, the Defendants,

JIMMY TORRES aka JIMMY TORRES-HOYOS, (1),
AND
EDUARDO RODRIGUEZ, (2),

each aiding and abetting the other, knowingly made a false statement and representation to S. A., a person licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Action Pawn #10, in that Defendant **EDUARDO RODRIGUEZ** did execute a United States Department of Justice, Bureau of Alcohol, Tobacco and Firearms Form 4473, Firearms Transaction Record, to the effect that he was the actual purchaser of a firearm, whereas in truth and in fact, he was not, in violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

COUNT FIVE
[18 U.S.C. § 924(a)(1)(A) and 2]

That on or about the 28th day of January, 2012, within the Western District of Texas, the Defendants,

JIMMY TORRES aka JIMMY TORRES-HOYOS, (1),

AND

EDUARDO RODRIGUEZ, (2),

each aiding and abetting the other, knowingly made a false statement and representation to D. S., a person licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Nagel's Gun Shop, in that Defendant EDUARDO RODRIGUEZ did execute a United States Department of Justice, Bureau of Alcohol, Tobacco and Firearms Form 4473, Firearms Transaction Record, to the effect that he was the actual purchaser of a firearm, whereas in truth and in fact, he was not, in violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

COUNT SIX
[18 U.S.C. §924(a)(1)(A) and 2]

That on or about the 18th day of November, 2011, within the Western District of Texas, the Defendants,

JIMMY TORRES aka JIMMY TORRES-HOYOS, (1),

each aiding and abetting the other, knowingly made a false statement and representation to

S. A., a person licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Action Pawn #10, in that did execute a United States Department of Justice, Bureau of Alcohol, Tobacco and Firearms Form 4473, Firearms Transaction Record, to the effect that she was the actual purchaser of a firearm, whereas in truth and in fact, she was not, in violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

COUNT SEVEN
[18 U.S.C. §924(a)(1)(A) and 2]

That on or about the 18th day of November, 2011, within the Western District of Texas, the Defendants,

JIMMY TORRES aka JIMMY TORRES-HOYOS, (1),

each aiding and abetting the other, knowingly made a false statement and representation to S. A., a person licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Action Pawn #10, in that did execute a United States Department of Justice, Bureau of Alcohol, Tobacco and Firearms Form 4473, Firearms Transaction Record, to the effect that she was the actual purchaser of a firearm, whereas in truth and in fact, she was not, in violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

COUNT EIGHT
[18 U.S.C. §924(a)(1)(A) and 2]

That on or about the 31st of December, 2011, within the Western District of Texas, the Defendants,

JIMMY TORRES aka JIMMY TORRES-HOYOS, (1),
EDDIE RAMOS, (4),

each aiding and abetting the other, knowingly made a false statement and representation to E. D., a person licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Action Pawn #10, in that

did execute a United States Department of Justice, Bureau of Alcohol, Tobacco and Firearms Form 4473, Firearms Transaction Record, to the effect that she was the actual purchaser of a firearm, whereas in truth and in fact, she was not, in violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

COUNT NINE
[18 U.S.C. §924(a)(1)(A) and 2]

That on or about the 31st of December, 2011, within the Western District of Texas, the Defendants,

JIMMY TORRES aka JIMMY TORRES-HOYOS, (1),
EDDIE RAMOS, (4),

each aiding and abetting the other, knowingly made a false statement and representation to E. D., a person licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Action Pawn #10, in that

did execute a United States Department of Justice, Bureau of Alcohol, Tobacco and Firearms Form 4473, Firearms Transaction Record, to the effect that she was the actual purchaser of a firearm, whereas in truth and in fact, she was not, in violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

COUNT TEN
[18 U.S.C. §924(a)(1)(A) and 2]

That on or about the 3rd of January, 2012, within the Western District of Texas, the Defendants,

JIMMY TORRES aka JIMMY TORRES-HOYOS, (1),

EDDIE RAMOS, (4),

each aiding and abetting the other, knowingly made a false statement and representation to R. R., a person licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Action Pawn #11, in that

did execute a United States Department of Justice, Bureau of Alcohol, Tobacco and

Firearms Form 4473, Firearms Transaction Record, to the effect that she was the actual purchaser of a firearm, whereas in truth and in fact, she was not, in violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

COUNT ELEVEN
[18 U.S.C. §924(a)(1)(A) and 2]

That on or about the 3rd of January, 2012, within the Western District of Texas, the Defendants,

JIMMY TORRES aka JIMMY TORRES-HOYOS, (1),

EDDIE RAMOS, (4),

each aiding and abetting the other, knowingly made a false statement and representation to M. G., a person licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Action Pawn #6, in that did execute a United States Department of Justice, Bureau of Alcohol, Tobacco and Firearms Form 4473, Firearms Transaction Record, to the effect that she was the actual purchaser of a firearm, whereas in truth and in fact, she was not, in violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

COUNT TWELVE
[18 U.S.C. §924(a)(1)(A) and 2]

That on or about the 23rd of January, 2012, within the Western District of Texas, the Defendants,

JIMMY TORRES aka JIMMY TORRES-HOYOS, (1),

EDDIE RAMOS, (4),

each aiding and abetting the other, knowingly made a false statement and representation to S. B., a person licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Texas Guns, in that

did execute a United States Department of Justice, Bureau of Alcohol, Tobacco and Firearms Form 4473, Firearms Transaction Record, to the effect that he was the actual purchaser of a firearm, whereas in truth and in fact, he was not, in violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

COUNT THIRTEEN
[18 U.S.C. §924(a)(1)(A) and 2]

That on or about the 23rd of January, 2012, within the Western District of Texas, the Defendants,

JIMMY TORRES aka JIMMY TORRES-HOYOS, (1),

EDDIE RAMOS, (4),

each aiding and abetting the other, knowingly made a false statement and representation to S. B., a person licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Texas Guns, in that

did execute a United States Department of Justice, Bureau of Alcohol, Tobacco and Firearms Form 4473, Firearms Transaction Record, to the effect that he was the actual purchaser of a firearm, whereas in truth and in fact, he was not, in violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

COUNT FOURTEEN
[18 U.S.C. §924(a)(1)(A) and 2]

That on or about the 30th of December, 2011, within the Western District of Texas, the Defendants,

JIMMY TORRES aka JIMMY TORRES-HOYOS, (1),

EDDIE RAMOS, (4),

each aiding and abetting the other, knowingly made a false statement and representation to A. R., a person licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Action Pawn # 11, in that did execute a United States Department of Justice, Bureau of Alcohol, Tobacco and Firearms Form 4473, Firearms Transaction Record, to the effect that she was the actual purchaser of a firearm, whereas in truth and in fact, she was not, in violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

COUNT FIFTEEN
[18 U.S.C. §924(a)(1)(A) and 2]

That on or about the 28th of January, 2012, within the Western District of Texas, the Defendants,

JIMMY TORRES aka JIMMY TORRES-HOYOS, (1),

EDDIE RAMOS, (4),

each aiding and abetting the other, knowingly made a false statement and representation to D. H., a person licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Nagel's Gun Shop, in that did execute a United States Department of Justice, Bureau of Alcohol, Tobacco and Firearms Form 4473, Firearms Transaction Record, to the effect that he was the actual purchaser of a firearm, whereas in truth and in fact, he was not, in violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

COUNT SIXTEEN
[18 U.S.C. §924(a)(1)(A) and 2]

That on or about the 28th of January, 2012, within the Western District of Texas, the Defendants,

JIMMY TORRES aka JIMMY TORRES-HOYOS, (1),

EDDIE RAMOS, (4),

each aiding and abetting the other, knowingly made a false statement and representation to

L. B., a person licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Don's Gun Shop, in that did execute a United States Department of Justice, Bureau of Alcohol, Tobacco and Firearms Form 4473, Firearms Transaction Record, to the effect that he was the actual purchaser of a firearm, whereas in truth and in fact, he was not, in violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

COUNT SEVENTEEN
[18 U.S.C. §924(a)(1)(A) and 2]

That on or about the 5th of January, 2012, within the Western District of Texas, the Defendants,

JIMMY TORRES aka JIMMY TORRES-HOYOS, (1),
EDDIE RAMOS, (4),

each aiding and abetting the other, knowingly made a false statement and representation to L. B., a person licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Nagels' Gun Shop, in that

did execute a United States Department of Justice, Bureau of Alcohol, Tobacco and Firearms Form 4473, Firearms Transaction Record, to the effect that she was the actual purchaser of a firearm, whereas in truth and in fact, she was not, in violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

COUNT EIGHTEEN
[18 U.S.C. §924(a)(1)(A) and 2]

That on or about the 5th of January, 2012, within the Western District of Texas, the Defendants,

JIMMY TORRES aka JIMMY TORRES-HOYOS, (1),
EDDIE RAMOS, (4),

each aiding and abetting the other, knowingly made a false statement and representation to L. B., a person licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Nagel's Gun Shop, in that

did execute a United States Department of Justice, Bureau of Alcohol, Tobacco and Firearms Form 4473, Firearms Transaction Record, to the effect that she was the actual purchaser of a firearm, whereas in truth and in fact, she was not, in violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

COUNT NINETEEN
[18 U.S.C. §924(a)(1)(A) and 2]

That on or about the 19th of December, 2011, within the Western District of Texas, the Defendants,

JIMMY TORRES aka JIMMY TORRES-HOYOS, (1),
RAMON ERNESTO ARMIJO, (11),
MATHEW ARTEAGA, (12),

AND

DESTINY DELAFUENTE, (13),

each aiding and abetting the other, knowingly made a false statement and representation to A. A., a person licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Action Pawn #10, in that Defendant DESTINY DELAFUENTE did execute a United States Department of Justice, Bureau of Alcohol, Tobacco and Firearms Form 4473, Firearms Transaction Record, to the effect that she was the actual purchaser of a firearm, whereas in truth and in fact, she was not, in violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

COUNT TWENTY
[18 U.S.C. §924(a)(1)(A) and 2]

That on or about the 21st of December, 2011, within the Western District of Texas, the Defendants,

JIMMY TORRES aka JIMMY TORRES-HOYOS, (1),

RAMON ERNESTO ARMIJO, (11),

MATHEW ARTEAGA, (12),

AND

DESTINY DELAFUENTE (13)

each aiding and abetting the other, knowingly made a false statement and representation to J. O., a person licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Action Pawn #11, in that Defendant DESTINY DELAFUENTE did execute a United States Department of Justice, Bureau of Alcohol, Tobacco and Firearms Form

4473, Firearms Transaction Record, to the effect that she was the actual purchaser of a firearm, whereas in truth and in fact, she was not, in violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

COUNT TWENTY-ONE
[18 U.S.C. §924(a)(1)(A) and 2]

That on or about the 29th of December, 2011, within the Western District of Texas, the Defendants,

JIMMY TORRES aka JIMMY TORRES-HOYOS, (1),
RAMON ERNESTO ARMIJO, (11),

each aiding and abetting the other, knowingly made a false statement and representation to J. O., a person licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Action Pawn #11, in that did execute a United States Department of Justice, Bureau of Alcohol, Tobacco and Firearms Form 4473, Firearms Transaction Record, to the effect that she was the actual purchaser of a firearm, whereas in truth and in fact, she was not, in violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

COUNT TWENTY-TWO
[18 U.S.C. §924(a)(1)(A) and 2]

That on or about the 4th of January, 2012, within the Western District of Texas, the Defendants,

JIMMY TORRES aka JIMMY TORRES-HOYOS, (1),

RAMON ERNESTO ARMIJO, (11),

each aiding and abetting the other, knowingly made a false statement and representation to A. A., a person licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Action Pawn #10, in that did execute a United States Department of Justice, Bureau of Alcohol, Tobacco and Firearms Form 4473, Firearms Transaction Record, to the effect that she was the actual purchaser of a firearm, whereas in truth and in fact, she was not, in violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

COUNT TWENTY-THREE
[18 U.S.C. §924(a)(1)(A) and 2]

That on or about the 21st of December, 2011, within the Western District of Texas, the Defendants,

JIMMY TORRES aka JIMMY TORRES-HOYOS, (1),

RAMON ERNESTO ARMIJO, (11),

ROBERT ALCARAZ, (15)

AND

LISA CAMPOS, (16),

each aiding and abetting the other, knowingly made a false statement and representation to A. R., a person licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Action Pawn #11, in that Defendant LISA CAMPOS did execute a

United States Department of Justice, Bureau of Alcohol, Tobacco and Firearms Form 4473, Firearms Transaction Record, to the effect that she was the actual purchaser of a firearm, whereas in truth and in fact, she was not, in violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

COUNT TWENTY-FOUR
[18 U.S.C. §924(a)(1)(A) and 2]

That on or about the 29th of December, 2011, within the Western District of Texas, the Defendants,

JIMMY TORRES aka JIMMY TORRES-HOYOS, (1),

RAMON ERNESTO ARMIJO, (11),

ROBERT ALCARAZ, (15),

AND

LISA CAMPOS, (16),

each aiding and abetting the other, knowingly made a false statement and representation to E. D., a person licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Action Pawn #10, in that Defendant LISA CAMPOS did execute a United States Department of Justice, Bureau of Alcohol, Tobacco and Firearms Form 4473, Firearms Transaction Record, to the effect that she was the actual purchaser of a firearm, whereas in truth and in fact, she was not, in violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

COUNT TWENTY-FIVE
[18 U.S.C. §924(a)(1)(A) and 2]

That on or about the 29th of December, 2011, within the Western District of Texas, the

Defendants,

JIMMY TORRES aka JIMMY TORRES-HOYOS, (1),

RAMON ERNESTO ARMIJO, (11),

ROBERT ALCARAZ, (15),

AND

LISA CAMPOS, (16),

each aiding and abetting the other, knowingly made a false statement and representation to E. D., a person licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Action Pawn #10, in that Defendant LISA CAMPOS did execute a United States Department of Justice, Bureau of Alcohol, Tobacco and Firearms Form 4473, Firearms Transaction Record, to the effect that she was the actual purchaser of a firearm, whereas in truth and in fact, she was not, in violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

COUNT TWENTY-SIX

[18 U.S.C. §924(a)(1)(A) and 2]

That on or about the 4th of January, 2012, within the Western District of Texas, the

Defendants,

JIMMY TORRES aka JIMMY TORRES-HOYOS, (1),

RAMON ERNESTO ARMIJO, (11),

ROBERT ALCARAZ, (15),

AND

LISA CAMPOS, (16),

each aiding and abetting the other, knowingly made a false statement and representation to R. V., a person licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Nagel's Gun Shop, in that Defendant LISA CAMPOS did execute a United States Department of Justice, Bureau of Alcohol, Tobacco and Firearms Form 4473, Firearms Transaction Record, to the effect that she was the actual purchaser of a firearm, whereas in truth and in fact, she was not, in violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

COUNT TWENTY-SEVEN
[18 U.S.C. §924(a)(1)(A) and 2]

That on or about the 17th of January, 2012, within the Western District of Texas, the Defendants,

JIMMY TÓRRES aka JIMMY TORRES-HOYOS, (1),

each aiding and abetting the other, knowingly made a false statement and representation to A. A., a person licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Action Pawn #10, in that did execute a United States Department of Justice, Bureau of Alcohol, Tobacco and Firearms Form 4473, Firearms Transaction Record, to the effect that she was the actual purchaser of a firearm, whereas in truth and in fact, she was not, in violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

COUNT TWENTY-EIGHT
[18 U.S.C. §924(a)(1)(A) and 2]

That on or about the 17th of January, 2012, within the Western District of Texas, the Defendants,

JIMMY TORRES aka JIMMY TORRES-HOYOS, (1),

each aiding and abetting the other, knowingly made a false statement and representation to A. A., a person licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Action Pawn #10, in that did execute a United States Department of Justice, Bureau of Alcohol, Tobacco and Firearms Form 4473, Firearms Transaction Record, to the effect that she was the actual purchaser of a firearm, whereas in truth and in fact, she was not, in violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

COUNT TWENTY-NINE
[18 U.S.C. §924(a)(1)(A) and 2]

That on or about the 30th of December, 2011, within the Western District of Texas, the Defendants,

JIMMY TORRES aka JIMMY TORRES-HOYOS, (1),

each aiding and abetting the other, knowingly made a false statement and representation to

L. B., a person licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Don's Gun Shop, in that did execute a United States Department of Justice, Bureau of Alcohol, Tobacco and Firearms Form 4473, Firearms Transaction Record, to the effect that he was the actual purchaser of a firearm, whereas in truth and in fact, he was not, in violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

COUNT THIRTY
[18 U.S.C. §924(a)(1)(A) and 2]

That on or about the 16th of January, 2012, within the Western District of Texas, the Defendants,

JIMMY TORRES aka JIMMY TORRES-HOYOS, (1),

each aiding and abetting the other, knowingly made a false statement and representation to T. S., a person licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Nagel's Gun Shop, in that did execute a United States Department of Justice, Bureau of Alcohol, Tobacco and Firearms Form 4473, Firearms Transaction Record, to the effect that he was the actual purchaser of a firearm, whereas in truth and in fact, he was not, in violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

COUNT THIRTY-ONE
[18 U.S.C. §924(a)(1)(A) and 2]

That on or about the 28th of December, 2011, within the Western District of Texas, the Defendants,

JIMMY TORRES aka JIMMY TORRES-HOYOS, (1),

each aiding and abetting the other, knowingly made a false statement and representation to R. R., a person licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Action Pawn #11, in that did execute a United States Department of Justice, Bureau of Alcohol, Tobacco and Firearms Form 4473, Firearms Transaction Record, to the effect that she was the actual purchaser of a firearm, whereas in truth and in fact, she was not, in violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

COUNT THIRTY-TWO
[18 U.S.C. §924(a)(1)(A) and 2]

That on or about the 5th of January, 2012, within the Western District of Texas, the Defendants,

JIMMY TORRES aka JIMMY TORRES-HOYOS, (1),

each aiding and abetting the other, knowingly made a false statement and representation to

S. B., a person licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Texas Guns, in that did execute a United States Department of Justice, Bureau of Alcohol, Tobacco and Firearms Form 4473, Firearms Transaction Record, to the effect that he was the actual purchaser of a firearm, whereas in truth and in fact, he was not, in violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

COUNT THIRTY-THREE
[18 U.S.C. §924(a)(1)(A) and 2]

That on or about the 5th of January, 2012, within the Western District of Texas, the Defendants,

JIMMY TORRES aka JIMMY TORRES-HOYOS, (1),

each aiding and abetting the other, knowingly made a false statement and representation to S. B., a person licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Texas Guns, in that did execute a United States Department of Justice, Bureau of Alcohol, Tobacco and Firearms Form 4473, Firearms Transaction Record, to the effect that he was the actual purchaser of a firearm, whereas in truth and in fact, he was not, in violation of Title 18, United States Code, Sections

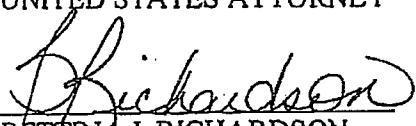
924(a)(1)(A) and 2.

A TRUE BILL.

FOREPERSON OF THE GRAND JURY

ROBERT PITMAN
UNITED STATES ATTORNEY

BY:


BETTINA J. RICHARDSON
Assistant United States Attorney